

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
MIDDLE DIVISION**

ROY S. MOORE,

Plaintiff,

v.

GUY CECIL; PRIORITIES USA;  
SENATE MAJORITY PAC (SMP);  
BULLY PULPIT INTERACTIVE LLC;  
and WATERFRONT STRATEGIES,

Defendants.

Civil Action

Case No. 4:19-cv-01855-CLM

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**LARRY KLAYMAN'S RESPONSE TO NOTICE REGARDING DISCIPLINARY  
ACTION AGAINST PLAINTIFF'S COUNSEL**

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On Friday, July 17, 2020, lead counsel for Defendants filed the above styled notice, knowing full well, as “seasoned” practitioners, that timely filed petitions for rehearing under Rules 35 and 40 of the District of Columbia Court of Appeals would mean that the order of the District of Columbia Court of Appeals is not yet a final order.<sup>1</sup> Attached as Exhibit 1 is a timely Petition for Rehearing En Banc which Mr. Klayman had a right to file under District of Columbia Court of Appeals Rule 35 after the original panel denied his initial petition before it. The District of Columbia’s Bar Disciplinary record was thus not updated and is in administrative

<sup>1</sup> In any event, Mr. Klayman remains a member continuously in good standing of The Florida Bar since 1977. Exhibit 2.

error, probably caused by a Bar Disciplinary Counsel that is a Democrat and very partisan. <sup>2</sup>Mr. Klayman, a Republican, is also strong supporter of the president in his public interest advocacy.

Accordingly, if and when the June 11 order becomes final, Mr. Klayman advised local counsel for Defendants Barry Rasgdale, who along with primary counsel Marc Elias and William Stafford of Perkins Coie LLP, that he would, if necessary, so properly advise this honorable Court.

That Defendants' counsel could not wait to again smear Mr. Klayman as they attempted at the outset of this case, in order to continue and join in with their clients' pattern and practice of smearing and defaming Plaintiff Chief Judge Roy Moore, is what regrettably necessitated this litigation. Defense counsels' conduct is curious.

Contrary to the offensive tactics of defense counsel, Mr. Klayman had not seen fit to raise the fact that Mr. Arias and Mr. Stafford of the Perkins Coie law firm are currently under criminal investigation by U.S. Attorney John Durham at the direction of Attorney General William Barr of the U.S Justice Department for laundering money on behalf of Hillary Clinton,

<sup>2</sup> District of Columbia Bar Disciplinary Counsel has donated repeatedly to Democrats, including former President Barack Obama, who Mr. Klayman has sued in his public interest capacity. Indeed, Bar Disciplinary Counsel entertained a bar complaint against Kellyanne Conway, counselor to President Trump, filed by leftist law professors, one of which, Michael Tiger, is an avowed communist who as reported by famed Washington Post investigative journalist, Bob Woodward, in his landmark book "The Brethren" about the Supreme Court, was fired by Chief Justice Earl Warren at the urging of J. Edgar Hoover and others for his subversive ties. The bar complaint filed against Kellyanne Conway' was largely for statements she had made on cable news. By contrast, a bar complaint filed by Ty Clevenger, a conservative lawyer activist, against David Kendall, longstanding legal counsel of the Clintons at Williams and Connolly, who allegedly assisted Hillary Clinton in the destruction of Benghazi emails on her private server, was quickly dismissed. A simple search of Federal Election Commission records and Google attests to the apparent partisanship of DC Bar Disciplinary Counsel and his Deputy Bar Counsels.

which monies paid for the now infamous and fraudulent Steele Dossier. It is well established that the Steele Dossier triggered the fraudulently induced Russian Collusion investigation of Special Counsel Robert Mueller. This apparent money laundering is also alleged to constitute criminal campaign finance violations, notwithstanding the fraudulent nature of the Steele Dossier itself, which defense counsel at Perkins Coie facilitated.<sup>3</sup> Of course, defense counsel have not offered to this honorable Court their apparent involvement in an on-going DOJ criminal investigation.

It is obvious to any reasonable person that the precipitous attempts to smear Mr. Klayman, counsel for Plaintiff Moore, stem from an improper and unethical attempt to influence and thus prejudice this honorable Court as it deliberates and may soon rule on the pending motion to dismiss filed by these counsel on behalf of their equally dishonest clients; clients who maliciously defamed Chief Justice Roy Moore for political and other improper purposes.

Importantly, the Honorable Andrew Carter of the U.S. District Court for the Southern District of New York recently denied a motion to dismiss in a case involving Sacha Baren Cohen's Showtime and CBS's similar defamation against Chief Justice Roy Moore and allowed the case to go forward. *Moore v. Cohen et al*, 1:19-cv-4977.

<sup>3</sup> See David Thomas, *Carter Page Suit Puts Fresh Spotlight on Perkins Coie, Marc Elias Over Trump 'Dossier'*, Law.com, Jan. 31, 2020, available at:

<https://www.law.com/nationallawjournal/2020/01/31/carter-page-suit-puts-fresh-spotlight-on-perkins-coie-marc-elias-over-trump-dossier/?slreturn=20200618120711>; see also

<https://www.nationalreview.com/corner/scandals-collide-dossier-dnc-server-perkins-coie/> see also

[https://www.abajournal.com/news/article/perkins\\_coie\\_hired\\_company\\_that\\_compiled\\_trump\\_dossier\\_on\\_behalf\\_of\\_clinton](https://www.abajournal.com/news/article/perkins_coie_hired_company_that_compiled_trump_dossier_on_behalf_of_clinton)

Respectfully submitted this 18th day of July 2020.

*/s/ Larry Klayman*

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**CERTIFICATE OF SERVICE**

I hereby certify that on July 18, 2020 I filed a copy of the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

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/s/ Larry Klayman  
Larry E. Klayman